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JUSTIN F. HEINRICH

June 6, 2011

Via Electronic Case Filing  
The Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Jonathan Rubin*  
*Case No. 09-CR -00360 (KAM)*

Dear Judge Matsumoto:

As Your Honor is aware, this law firm represents the defendant Jonathan Rubin in the above-referenced criminal action. I am writing to respectfully request that Mr. Rubin's bond conditions be modified to permit Mr. Rubin to travel on three separate occasions to accompany and chaperone his son to lacrosse tournaments in New Jersey, Pennsylvania and Rhode Island. Mr. Rubin was granted permission to travel last year for the same purpose, and these trips occurred without negative incident.

The following is the list of the dates and locations of Mr. Rubin's proposed trips:

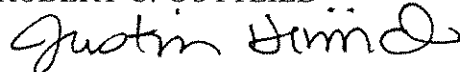
- Thursday, June 16, 2011 - Sunday June 19, 2011: Bethlehem, PA
- Thursday, July 7, 2011 - Monday, July 11, 2011: Somerset, NJ
- Wednesday, July 13, 2011 - Sunday, July 17, 2011: Warwick, RI

I have spoken with the Government and Mr. Rubin's Pretrial Services Officer who both indicate their consent to these requests. Mr. Rubin understands that he will provide a copy of his itinerary to Pretrial Services and contact his officer upon his returns home as he did for his previous trips.

Thank you very much for your consideration.

Very truly yours,

LAW OFFICES OF  
ROBERT C. GOTTLIEB

  
Justin Heinrich (JH0512)

cc: Shannon Jones, A.U.S.A. (via ECF)  
Robert Stehle, Pretrial Service Officer (via facsimile)